

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

In re CASSAVA SCIENCES, INC. §  
SECURITIES LITIGATION § Master File No. 1:21-cv-00751-DAE

---

This Document Relates To: § CLASS ACTION

ALL ACTIONS. §

---

**AGREED MOTION FOR FILING CONSOLIDATED COMPLAINT AND MOTION TO  
DISMISS BRIEFING**

Lead Plaintiff Mohammad Bozorgi (“Lead Plaintiff”) and defendants Cassava Sciences, Inc., Remi Barbier, Eric J. Schoen, James W. Kupiec, Nadav Friedmann, and Michael Marsman (collectively, “Defendants”) (together with Lead Plaintiff, the “Parties”), hereby jointly agree, subject to the Court’s approval, to a proposed schedule for: (1) the filing of Lead Plaintiff’s consolidated complaint; and (2) briefing on Defendants’ motion to dismiss the consolidated complaint.

WHEREAS:

1. The first complaint in this consolidated action was filed by Pierre Brazeau on August 27, 2021 (No. 1:21-cv-00751-RP) on behalf of a purported class of purchasers of securities of Cassava Sciences, Inc.;

2. On June 30, 2022, the Court consolidated all related actions and ordered the Parties to, among other things, confer within 14 days of the Court’s appointment of Lead Plaintiff and propose a schedule for: (1) Lead Plaintiff to file a consolidated complaint; and (2) briefing on Defendants’ motion to dismiss the consolidated complaint (ECF 58);

3. On June 30, 2022, the Court also appointed Mohammad Bozorgi as Lead Plaintiff and approved his selection of counsel, Robbins Geller Rudman & Dowd LLP, as Lead Counsel (ECF 59); and

4. The Parties have agreed to the following proposed schedule for the filing of the consolidated complaint and related motion to dismiss briefing.

IT IS HEREBY AGREED TO, by and between the undersigned Parties, and respectfully submitted for the Court’s approval, as follows:

1. Lead Plaintiff shall file a consolidated complaint no later than August 18, 2022;
2. Defendants shall file a motion to dismiss the consolidated complaint no later than October 17, 2022;

3. Lead Plaintiff shall file an opposition to the motion to dismiss the consolidated complaint no later than December 16, 2022; and

4. Defendants shall file a reply in support of the motion to dismiss the consolidated complaint no later than January 16, 2023.

This Agreed Motion will serve the interests of justice and the Parties agree that the proposed Order filed herewith may be entered without further notice.

DATED: July 14, 2022

KENDALL LAW GROUP, PLLC  
JOE KENDALL (Texas Bar No. 11260700)

---

*s/ Joe Kendall*

JOE KENDALL

3811 Turtle Creek Blvd., Suite 1450  
Dallas, TX 75219  
Telephone: 214/744-3000  
214/744-3015 (fax)  
jkendall@kendalllawgroup.com

Local Counsel for Lead Plaintiff

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DANIEL S. DROSMAN (CA Bar No. 200643)  
(*admitted pro hac vice*)  
KEVIN A. LAVELLE (CA Bar No. 292442)  
(*admitted pro hac vice*)  
NATALIE F. LAKOSIL (CA Bar No 322836)  
(*admitted pro hac vice*)  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
dand@rgrdlaw.com  
klavelle@rgrdlaw.com  
nlakosil@rgrdlaw.com

Lead Counsel for Lead Plaintiff

DATED: July 14, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP  
WILLIAM J. FOLEY (NY Bar No. 4797536)  
(*admitted pro hac vice*)  
CLAUDIA WILSON FROST (Texas State Bar  
No. 21671300)

---

*s/ William J. Foley*  
WILLIAM J. FOLEY

609 Main, 40th Floor  
Houston, TX 77002  
Telephone: 713-658.6400  
713/658.6401 (fax)  
wfoley@orrick.com  
cfrost@orrick.com

ORRICK, HERRINGTON & SUTCLIFFE LLP  
JAMES N. KRAMER (CA Bar No. 154709)  
(*admitted pro hac vice*)  
ALEXANDER K. TALARIDES (CA Bar No.  
268068) (*admitted pro hac vice*)  
405 Howard Street  
San Francisco, CA 94105  
Telephone: 415/773-5700  
415/773-5759 (fax)  
atalarides@orrick.com  
jkramer@orrick.com

ORRICK, HERRINGTON & SUTCLIFFE LLP  
WILLIAM J. FOLEY (NY Bar No. 4797536)  
(*admitted pro hac vice*)  
51 West 52nd Street  
New York, NY 10019  
Telephone: 212/506.5000  
212/506-5151 (fax)  
wfoley@orrick.com

Attorneys for Defendants Cassava Sciences, Inc.,  
Remi Barbier, Eric J. Schoen, James W. Kupiec,  
Nadav Friedmann, and Michael Marsman

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that he has conferred by email on July 13 and 14, 2022 with Alexander K. Talarides, counsel for Defendants, who confirmed that each Defendant agreed to this motion.

*/s/ Kevin A. Lavelle*

---

KEVIN A. LAVELLE

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on July 14, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ *Joe Kendall*  
JOE KENDALL

KENDALL LAW GROUP, PLLC  
3811 Turtle Creek Blvd., Suite 1450  
Dallas, TX 75219  
Telephone: 214/744-3000  
214/744-3015 (fax)  
jkendall@kendalllawgroup.com